

IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF MISSISSIPPI  
SOUTHERN DIVISION

RAYMOND LIZANA

PLAINTIFF

VS.

CIVIL ACTION NO. 1:08-CV-501-LTS-MTP

STATE FARM FIRE & CASUALTY COMPANY

DEFENDANT

**NOTICE OF 30(b)(6) VIDEO DEPOSITION AND  
ISSUANCE OF DEPOSITION SUBPOENA DUCES TECUM**

TO: ALL COUNSEL OF RECORD

PLEASE TAKE NOTICE that pursuant to Rule 30(b)(6) of the Federal Rules of Civil Procedure, the Plaintiff, Raymond Lizana, will take the video deposition upon oral examination of one or more officers, directors or managing agents, or other designated person(s) who consents to testify on behalf of State Farm Fire and Casualty Company on December 14, 2009 and December 15, 2009, at the offices of Hickman, Goza & Spragins, 115 Homestead Drive, Madison, MS 39110, beginning at 9:00 a.m. Said deposition shall be taken before an official Court Reporter or some other person duly authorize administer oaths. The deposition will commence at the time and date as herein stated, and will continue from day to day until completed.

Pursuant to FRCP 30(b)(6), Defendant “shall designate one or more officers, directors, managing agents, or other persons who consent to testify on its behalf”, and “the persons so designated shall testify as to matters known or reasonably available” to said corporation.

Further, pursuant to FRCP 30(b)(6), Plaintiff requests that, at the time and place of the taking of said deposition, said corporation produce for inspection and copying **the original of**

each note, memorandum, item of correspondence, picture, videotape, audiotape, policy and/or procedure manual, drawing or other document evidencing or relating to all matters described below as they relate to the occurrence made the basis of Plaintiff's Complaint, which are more specifically described and requested in the attached Schedule B.

Plaintiff further requests that the corporate representative(s) should be the person or persons most familiar with the topics listed in the attached Schedule A.

Respectfully submitted,

/s/Deborah R. Trotter

Deborah R. Trotter, MS Bar# 101360

**MERLIN LAW GROUP, P.A.**

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**CERTIFICATE OF SERVICE**

I, DEBORAH R. TROTTER, do hereby certify that I have on this date electronically filed the foregoing document with the Clerk of Court using the ECF system, which sent notification of such filing to the following:

Hal S. Spragins  
Hickman, Goza & Spragins  
P.O. Drawer 668  
Oxford, MS 38655  
[sspragins@hickmanlaw.com](mailto:sspragins@hickmanlaw.com)

This the 30<sup>th</sup> day of October, 2009.

/s/Deborah R. Trotter

Deborah R. Trotter, MSB #101360

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